

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	Chapter 11
)	
THE PHILADELPHIA ORCHESTRA ASSOCIATION,)	Case No. 11-13098-ELF
)	
Debtor.)	Honorable Eric L. Frank
)	

**NOTICE OF APPEARANCE FOR
UNITED STATES GOVERNMENT ATTORNEY M. KATHERINE BURGESS**

PLEASE TAKE NOTICE that the Pension Benefit Guaranty Corporation (“PBGC”), an agency of the United States Government and a creditor in the above-captioned case, hereby files this notice of appearance pursuant to L.B.R. 2090-1(a)(ii) and Local Civil Rule 83.5(e). The PBGC is a United States Government corporation that administers and enforces the pension plan termination program established under Title IV of the Employee Retirement Income Security Act of 1974 (“ERISA”), *as amended*, 29 U.S.C. §§ 1001-1461 (2006 & Supp. III 2009), and an agency of the United States government under 28 U.S.C. § 451.

This request includes, inter alia, the notices and papers referred to in Bankruptcy Rules 2002, 3017 (including all disclosure statements and plans of reorganization) and 9007, notices of any orders, applications, complaints, demands, hearings, motions, petitions, pleadings or requests, and any other documents brought before this Court in this case, whether formal or informal, ex parte or on notice, written or oral, or transmitted or conveyed by mail, electronic mail, personal delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that this entry of appearance and request for notice is without prejudice to PBGC's rights, remedies and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed or construed to be a waiver of PBGC's rights: (i) to have final orders and non-core matters entered only after de novo review by a district court, (ii) to trial by jury in any proceedings so triable in these cases or in any controversy or proceeding related to this case, (iii) to have the district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert any other rights, claims, actions, defenses, setoffs or recoupments to which PBGC is or may be entitled in law or in equity, all of which PBGC expressly reserves.

DATED: April 27, 2011
Washington, D.C.

Respectfully submitted,

/s/ M. Katherine Burgess
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